

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,

Plaintiff,

v.

2K GAMES, INC. and TAKE-TWO
INTERACTIVE SOFTWARE, INC.,

Defendants.

CASE NO. 1:17-cv-02635-CAB

**JOINT MOTION TO SEAL
OMNIBUS MOTIONS *IN LIMINE* AND EXHIBITS THERETO**

In accordance with Local Rule 5.2 and the Court's Protective Order (Dkt. 32), Defendants 2K Games, Inc. and Take-Two Interactive Software, Inc. (collectively, "Take-Two") and Plaintiff James Hayden ("Hayden") hereby move for leave to file under seal: (1) an unredacted version of each party's respective forthcoming omnibus motions *in limine* briefing and (2) accompanying exhibits. Specifically, the parties move for leave to redact from their respective briefing and file under seal exhibits that contain information that was designated as confidential by the parties, pursuant to the Protective Order entered in this case. Dkt. 32. To maintain the confidentiality of that information, therefore, each party will file a public version of its briefing that has the designated-as-confidential information redacted, and each party seeks leave by this motion to file the unredacted versions and their accompanying exhibits under seal. Each party will serve the other with the unredacted versions of all filings including the motion and exhibits, and will file under seal the unredacted versions when the Court grants this motion or as otherwise directed by the Court.

Dated: July 29, 2022

/s/ Andrew Alexander

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